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Attorneys for Respondent
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff/Respondent,
v.
BAO LU, SON VAN NGUYEN, THY
CHANN, and HOANG AI LE,
Defendants/Movants.

2:99-CR-00433-WBS-AC

**CONSOLIDATED STIPULATION AND
[PROPOSED] ORDER FOR EXTENSION OF TIME
IN WHICH TO FILE OBJECTIONS TO
MAGISTRATE JUDGE'S FINDINGS AND
RECOMMENDATIONS.**

(ECF. 1807 – 1810)

Respondent United States of America, by and through its attorneys of record, McGregor W. Scott, United States Attorney, and Jason Hitt, Assistant United States Attorney, hereby requests a 30-day extension of time until September 23, 2019, in which to file its consolidated objections to Magistrate Judge's findings and recommendations. Docket Nos. 1807-1810.

In light of the recent decisions in *United States v. Davis*, 677 Fed. Appx. 933 and *United States v. Begay*, ___ F.3d ___, 2019 WL 3884261; counsel for the Government is awaiting additional guidance from the Department.

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**STIPULATION FOR EXTENSION OF TIME TO FILE
OBJECTIONS TO THE MAGISTRATE JUDGE'S FINDINGS
AND RECOMMENDATIONS**

1 Geoffrey M. Jones, counsel for Hoang Ai Le, does not oppose the Government's request.
2 Katherine Hart, counsel for Bao Lu, does not oppose the Government's request.
3 Lindsay Weston, counsel for Thy Chann, does not oppose the Government's request.
4 Benjamin Ramos, counsel for Son Van Nguyen, does not oppose the Government's request.

5 Dated: August 23, 2019

McGREGOR W. SCOTT
United States Attorney

6
7 /s/ *JASON HITT*
8 JASON HITT
9 Assistant United States Attorney

10 Dated: August 23, 2019

11 /s/ *GEOFFREY JONES*
12 GEOFFREY JONES
13 Attorney for Hoang Ai Le

14 Dated: August 23, 2019

15 /s/ *KATHERINE HART*
16 KATHERINE HART
17 Attorney for Bao Lu

18 Dated: August 23, 2019

19 /s/ *LINDSAY WESTON*
20 LINDSAY WESTON
21 Attorney for Thy Chann

22 Dated: August 23, 2019

23 /s/ *BENJAMIN RAMOS*
24 BENJAMIN RAMOS
25 Attorney for Son Van Nguyen

[PROPOSED] ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

It is further ordered that the Government's Consolidated Objections to the Magistrate Judge's Findings and Recommendations is now due September 23, 2019.

DATED: August 23, 2019

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE